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Site-Specific Standard Operating Procedure for Data Validation of Asbestos Results Obtained by Reflectance Spectroscopy for the Contaminant Screening Study of the Libby Asbestos Project

Project Libby Asbestos Remedial Investigation - Contaminant Screening Study (CSS)

Project Number 3282-116

Prepared by Dee Warren
Environmental Specialist

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Date

Approved by _____
Project Manager Date

Technical Reviewer Date

QA Reviewer Date

Default goals included
nodes made as we go

No US Environmental Protection Agency (EPA) approved criteria currently exists for the validation of asbestos results. The following procedures for data validation are based on the EPA Contract Laboratory Program (CLP) National Functional Guidelines for Inorganic Data Review (EPA 1994) and Standard Operating Procedure (SOP) No. ISSI-LIBBY-02, Reflectance Spectroscopy Screening for Asbestos in Soil (US Geological Survey [USGS] 2002). These procedures will be used in the data validation process for results gathered as part of the contaminant screening study (CSS) of the Libby Asbestos Project. This is a working document and applicable changes will be made as the validation procedure is implemented.

Section 1

Instrument Calibration and Standardization

1.1 Instrument Calibration

Calibration must be successfully completed at the beginning of each sample analysis run and repeated according to the manufacturer's recommendations or when instrument drift is detected. Calibration procedures are described in the manufacturer's operating manual for both wavelength and intensity. If the laboratory has failed to provide adequate calibration information, the designated representative should contact the laboratory and request the necessary information.

Evaluation Verify calibration was performed at the proper frequency

Action Minimum frequency was not met, qualify the data as unusable (R)

* No evidence of instrument drift

1 2 Continuing Calibration

An independent reference material must be analyzed for wavelength and intensity with each analytical batch or once a day, whichever is more frequent. An analytical batch is comprised of 20 field samples. The acceptable percent recovery (%R) for continuing calibration criteria is between 80 and 120%R. %R is calculated by the following:

$$\%R = \frac{\text{Found}}{\text{True}} \times 100$$

Where Found = result of asbestos (percent weight) measured in the reference material

True = result of asbestos (percent weight) in the reference material

Evaluation Verify continuing calibration was performed at the required frequency for both wavelength and intensity

Action Minimum frequency was not met qualify the data as unusable (R) *

Evaluation Verify continuing calibration is between 80 and 120%R for both wavelength and intensity *CCV bounding samples*

Action

| %R | Detected Results Qualifier | Nondetected Results Qualifier |
|----------|--|----------------------------------|
| 65-79% | J V | U V |
| 121-135% | J A | No qualifier |
| <65% | <i>>1% unless</i> | <i>R</i> No qualifier |
| >135% | <i>high bias</i> R <i>J A</i> | No qualifier |

Process of why the qualifier was chosen for each circumstance

slightly low - estimation so 10th later value is 1.25% estimated
significantly low bias on QC samples = low bias on samples 20% + 10% should reach 30% or 40%
significant high bias - QC sample is bias high so data user so data is not biased rich

1 3 Spectra Standardization

All spectra must be fully corrected to absolute reflectance before any analysis can be performed

Evaluation Verify standardization was performed at the proper frequency

Action Standardization was not performed qualify the data as unusable (R) *

Section 2

Method Blanks

An instrument blank is composed of the field sample matrix that is free of the analyte of interest (e.g., asbestos-free soil). Method blanks are put through the same sample preparation steps as field samples and are used to discern if laboratory-induced contamination is present. ~~Detection of a single asbestos fiber suggests that laboratory-induced contamination is present.~~ All associated samples may require re-preparation and re-analysis. Method blanks must be analyzed with each analytical batch or once a day whichever is more frequent. An analytical batch is comprised of 20 field samples. Multiplying the highest concentration of asbestos detected in the method blank times five gives the action level for qualification based on method blank contamination.

Evaluation Verify method blank analysis was performed at the required frequency

Action Minimum frequency was not met the validator should use professional judgment to determine if the associated sample results should be qualified

Evaluation Calculate the method blank action level for qualification

Action All detected results less than the action level are qualified as estimated (U)

Section 3

Laboratory Control Sample (LCS)

Laboratory control samples are certified reference standards (independent from the calibration standards), consisting of several asbestiforms. Because LCSs are independent of the calibration standards, they are analyzed to verify the accuracy of the standards used to calibrate the instrument for wavelength and intensity. An LCS must be analyzed with each analytical batch or once a day whichever is more frequent. The LCS will be evaluated on two parameters and it must meet the acceptance criteria for both to be considered acceptable. These parameters are (1) accurate asbestiform identification and (2) accurate fiber counting and sizing. The acceptable %R for LCS criteria is between 80 and 120%R. %R is calculated by the following:

$$\%R = \frac{\text{Found}}{\text{True}} \times 100$$

Where Found = result of asbestos (percent weight) measured in the LCS

True = result of asbestos (percent weight) in the LCS source

relate to
percentage
of results
below
detection
limit

Qualify
@ or below
method
blank.

Change as
CCV

Method blank &
control within
implies no
contamination
if a sample
from the
batch

Evaluation Verify LCS analysis was performed at the required frequency for wavelength and intensity

Action The validator should use professional judgment to determine if the associated sample results should be qualified

Evaluation Verify LCS result is between 80 and 120%R for wavelength and intensity

Action

| %R | Detected Results Qualifier | Nondetected Results Qualifier |
|----------|----------------------------|-------------------------------|
| 65-79% | J | UJ |
| 121-135% | J | No qualifier |
| <65% | R | No qualifier |
| >135% | R | No qualifier |

SAMPLE
AS 1-1-1

Section 4

Duplicate Sample Analysis

4.1 Laboratory Duplicate Samples

Laboratory duplicate samples are splits of a well-homogenized sample that is prepared by the laboratory personnel. Because the laboratory is aware that the samples are duplicates, these samples serve to test the precision of the laboratory's sample preparation and analysis. A laboratory duplicate should be performed at a frequency of 5 percent of all field samples prepared for analysis (one laboratory duplicate for every 20 field samples) or one per preparation batch, whichever is more frequent. The acceptable criteria for a laboratory duplicate is a relative percent difference (RPD) less than or equal to 35 percent when both results are >5 times the reporting limit, or the difference between the duplicate and the original is less than two times the reporting limit when either sample result is <5 times the reporting limit.

Evaluation Verify laboratory duplicate sample analysis was performed at the required frequency

Action The validator should use professional judgment to determine if the associated sample results should be qualified

Evaluation Verify $RPD \leq 35$ percent or difference is less than two times the reporting limit, whichever is applicable

Action RPD > 35 percent or difference is greater than two times the reporting limit qualify all results as estimated (J)

4.2 Field Duplicate Samples

Field duplicate samples are co-located soil samples that are collected by the field personnel, but the laboratory is unaware that the samples are duplicates. These samples serve to test the precision of both the field sampling and the laboratory's sample preparation and analysis. A field duplicate should be collected at a frequency of 5 percent of all field samples prepared for analysis (one laboratory duplicate for every 20 field samples) or one per preparation batch, whichever is more frequent. The acceptable criteria for a field duplicate is an RPD less than or equal to 50 percent when both results are >5 times the reporting limit or the difference between the duplicate and the original is less than four times the reporting limit when either sample result is <5 times the reporting limit.

Evaluation Verify field duplicate sample analysis was performed at the required frequency.

Action The validator should use professional judgment to determine if the associated sample results should be qualified.

Evaluation Verify RPD ≤ 50 percent, or difference is less than four times the reporting limit, whichever is applicable.

Action RPD > 50 percent, or difference is greater than four times the reporting limit, qualify all results as estimated (J).

4.3 Preparation Duplicate Samples

Preparation duplicate samples are splits of samples submitted for sample preparation prior to laboratory analysis. These samples serve to test the precision of both the sample preparation personnel and the laboratory's sample preparation and analysis. A preparation duplicate sample should be submitted at a frequency of 5 percent of the first 500 field samples prepared for analysis or one per preparation batch, whichever is more frequent. The acceptable criteria for a field duplicate is an RPD less than or equal to 50 percent when both results are >5 times the reporting limit, or the difference between the duplicate and the original is less than four times the reporting limit when either sample result is <5 times the reporting limit. If the average RPD for the first 500 samples is ≤ 50 percent, preparation duplicate sample analysis will not continue. If the average RPD for the first 500 samples is > 50 percent, preparation duplicate sample analysis will continue at a rate of 2 percent for the remainder of the project.

Evaluation Verify preparation duplicate sample analysis was performed at the required frequency.

Action The validator should use professional judgment to determine if the associated sample results should be qualified

Evaluation Verify $RPD \leq 50$ percent or difference is less than four times the reporting limit, whichever is applicable

Action $RPD > 50$ percent, or difference is greater than four times the reporting limit, qualify all results as estimated (J)

4.3 IR and SEM Sample Splits

Selected field samples will be analyzed by both infrared spectroscopy (IR) and scanning electron microscopy (SEM) methods. The sample results will be compared to determine if the IR results and SEM results are within an acceptable RPD range. The acceptable criteria for a laboratory duplicate is an RPD less than or equal to 35 percent when both results are >5 times the reporting limit, or the difference between the duplicate and the original is less than two times the reporting limit when either sample result is <5 times the reporting limit.

Evaluation Verify $RPD \leq 35$ percent, or difference is less than two times the reporting limit

Action $RPD > 35$ percent or difference is greater than two times the reporting limit, qualify all results as estimated (J)

Section 5 Rinsate Samples

Rinsate samples are collected to determine if decontamination procedures utilized in the field are not adequate and result in cross-contamination of samples. Rinsate samples will be collected at the end of each day during the first week of sampling. Continuation of rinsate sample collection will depend on the results of the initial rinsate samples. Multiplying the highest concentration of asbestos detected in the rinsate times five gives the action level for qualification based on contamination from sampling equipment.

■ **Evaluation** Verify rinsate sample analysis was performed at the required frequency

■ **Action** Minimum frequency was not met, the validator should use professional judgment to determine if the associated sample results should be qualified

■ **Evaluation** Calculate rinsate sample action level for qualification

■ **Action** All associated detected results less than the action level are qualified as nondetect (U)

Paired with
solid decon
sample
Silica sand
Keep sample
collection
frequency
Once @ beginning
middle
end

